



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

April 28, 2021

BY ECF

The Honorable Vernon S. Broderick
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: United States v. De La Cruz Rodriguez, et al., 20 Cr. 147 (VSB)

Dear Judge Broderick:

The parties have reached a disposition as to defendant Miguel De La Cruz Rodriguez and respectfully request that a change-of-plea hearing be scheduled. Counsel for De La Cruz Rodriguez requests that the hearing be scheduled for a date in approximately two weeks to permit her to confer again with the defendant.

The Government will be prepared to proceed with respect to defendant Arsenio Genao Francisco at the conference on April 30, 2021.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

by: /s/ Jun Xiang

Jun Xiang
Assistant United States Attorney
(212) 637-2289

CC: Amy Gallicchio, Esq. (by ECF)
Stephen Turano, Esq. (by ECF)

**APPLICATION GRANTED
SO ORDERED** 
VERNON S. BRODERICK
U.S.D.J. 4/29/2021

The status conference scheduled for April 30, 2021 as to Defendant De La Cruz Rodriguez is hereby adjourned. A change of plea hearing is scheduled for May 17, 2021 at 9:00 a.m. The adjournment is necessary to allow the defendant an opportunity to review his plea agreement with his attorney. The Court finds that the ends of justice served by granting a continuance outweigh the best interests of the public and the defendant in a speedy trial. Accordingly, it is further ordered that the time between April 30, 2021 and May 17, 2021 is hereby excluded under the Speedy Trial Act, 18 U.S.C. 3161 (h)(7)(A), in the interest of justice.